

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

<p><b>IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b></p>	<p><b>Master File No. 2:12-MD-02327 MDL 2327</b></p>
<p><b>THIS DOCUMENT RELATES TO: ETHICON WAVE 12 CASES LISTED IN PLAINTIFFS' EXHIBIT A</b></p>	<p><b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b></p>

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF  
ELIZABETH KAVALER, M.D. FOR WAVE 12**

Comes now, the Defendants, and hereby adopt and incorporate by reference the Daubert response filed in relation to Elizabeth Kavaler, M.D. in Ethicon Wave 1, Case No. 2:12-md-02327, ECF. No. 2165 (memorandum in support of opposition). Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing, and as stated in the Court's Memorandum Opinion and Order (*Daubert* Motion re: Elizabeth Kavaler, M.D.) [Dkt. 2704]. This notice applies to the Wave 12 cases identified in Plaintiffs' Exhibit A.

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**CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
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